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June 17, 1992

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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JUN 17 1992

Federal Communications Commission
Office of the Secretary

Re: CC Docket No. 92-77
Billed Party Preference
for 0+ InterLATA Calls

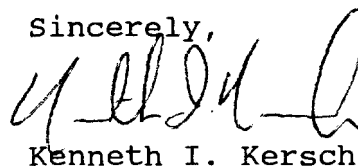
Dear Ms. Searcy:

Enclosed please find an original and four copies of the Reply Comments of International Telecharge, Inc. ("ITI") which are being filed in the above-referenced matter.

Also enclosed is a duplicate copy which I would appreciate your date stamping and returning to me in the envelope provided.

Thank you for your consideration.

Sincerely,



Kenneth I. Kersch

Enclosures

cc: FCC Commissioners
Legal Advisors to FCC Commissioners

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JUN 17 1992

Federal Communications Commission
Office of the Secretary

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	CC Docket No. 92-77
Billed Party Preference)	
For 0+ InterLATA Calls)	

REPLY COMMENTS OF INTERNATIONAL TELECHARGE, INC.

Respectfully submitted,

INTERNATIONAL TELECHARGE, INC.

Greg Casey
Senior Vice President, Regulatory
Affairs
Jane A. Fisher
Director, Federal Regulatory
(Acting)

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Bethesda, MD 20817
(301) 571-8665

June 17, 1992

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SUMMARY

The record compiled in this proceeding demonstrates that the public interest will best be served by adoption of a policy requiring all 0+ calling to be in the public domain. Under this policy, any interexchange carrier ("IXC") that issues a calling card which operates using 0+ access must allow all other IXCs to validate and bill calls placed on that card.

A policy of 0+ in the public domain will maximize consumer choice and decrease customer confusion and frustration. The most frequent complaint received by ITI operators from customers having difficulty placing a calling card call is that ITI cannot accept the AT&T CIID card, not that these customers cannot reach AT&T. If 0+ is placed in the public domain, customers desiring the convenience of 0+ calling will have the choice of using their calling card on a 0+ basis, even though the presubscribed carrier is not the carrier that issued the card. At the same time, customers desiring a particular carrier can always dial an access code.

Adoption of a policy of 0+ in the public domain also would best address the competitive inequities created by AT&T's CIID card program and provide a logical transition to billed party preference, should the Commission ultimately adopt that regulatory scheme. Further, there are no technical impediments to requiring AT&T to supply validation and billing of CIID cards on a nondiscriminatory basis.

Finally, contrary to AT&T's claims that the CIID card program was necessary to protect AT&T customers from "unscrupulous AOS companies", the record in this rulemaking demonstrates that AT&T's introduction of the CIID card had nothing to do with providing quality service to its customers. Rather, as demonstrated in AT&T's marketing materials, AT&T's purpose behind the CIID card was to remonopolize operator services.

For the foregoing reasons, ITI respectfully requests the Commission to require carriers issuing proprietary 0+ CIID cards to provide nondiscriminatory access to validation and billing for their calling cards.

JUN 17 1992

Federal Communications Commission
Office of the Secretary

CC Docket No. 92-77

REPLY COMMENTS OF INTERNATIONAL TELECHARGE, INC.

International Telecharge, Inc. ("ITI") hereby submits its reply to the comments filed in the above-captioned proceeding. The record compiled in this proceeding demonstrates that the public interest will best be served by adoption of a policy requiring all 0+ calling to be in the public domain. Under this policy, any interexchange carrier ("IXC") that issues a calling card which operates using 0+ access must allow all other IXCs to validate and bill calls placed on that card. As explained below, no other alternative discussed in the Commission's Notice of Proposed Rulemaking ("NPRM" or "Notice") or by other commenters in this docket will maximize consumer choice while correcting the competitive inequities created by AT&T's CIID card program.

I. A POLICY OF 0+ IN THE PUBLIC DOMAIN WILL MAXIMIZE CONSUMER CHOICE, REDUCE CONSUMER FRUSTRATION AND PROVIDE A LOGICAL TRANSITION TO BILLED PARTY PREFERENCE

A. 0+ in the Public Domain Will Increase Customer Choice

A major impetus behind the Commission's adoption of the Notice in this proceeding was to simplify the process of making an operator service call, which the Commission found "has become more

complex and confusing to many consumers."¹ It has been the experience of ITI's operators and customer service personnel that the introduction of the proprietary 0+ CIID card is the single greatest cause of customer confusion and frustration in placing a calling card call today.²

As demonstrated by the attached signatures of 115 members of ITI's operator services staff and the Declarations of three operator managers, the most frequent complaint received from customers having difficulty placing a calling card call is that ITI cannot accept the AT&T CIID card. It has been the common experience of these operators that ordinarily customers are not frustrated because they cannot reach AT&T, but rather because they cannot use their card on a 0+ basis. As a Group Manager in ITI's toll center stated:

In the past year the complaints have increased greatly and the majority of concerns focus on the customer's attempt to use cards in the CIID format. However, it is only a very small minority of customers that continually insist on utilizing AT&T. Most, we have experienced, just want to place their call and are baffled, confused, frustrated and in many cases angered by the fact that ITI cannot accept their CIID card.³

This customer frustration is, of course, inevitable when placed in the context of AT&T's deceptive CIID card marketing program. As established in ITI's initial comments, AT&T induced

¹ Billed Party Preference for InterLATA Calls, CC Docket No. 92-77, FCC 92-169 (rel. May 8, 1992).

² See Affidavits of ITI personnel attached hereto.

³ Declaration of Polly Hudson, Group Manager, ITI, dated June 15, 1992, (attached).

customers to destroy their old shared use calling cards -- which could be accepted by all IXC's -- by stating that, "due to government regulation", these cards would no longer work or would no longer be accepted by AT&T.⁴ Hence, contrary to AT&T's contentions, customers were not clamoring to use the CIID card in order to be assured access to AT&T in order to avoid the services of AT&T's competitors.⁵ Rather, customers were duped by AT&T into believing that their existing, shared use calling card product -- which AT&T's own marketing studies showed customers preferred⁶ -- was obsolete. AT&T's arguments are directly contradicted by the shared experience of ITI personnel in handling AT&T CIID card customers.

Requiring carriers offering 0+ calling cards to allow all IXC's nondiscriminatory access to validation and billing of those cards will reduce customer frustration while maximizing customer choice. Customers desiring the convenience of 0+ calling will have the choice of using their calling card on a 0+ basis, even though the presubscribed carrier is not the carrier that issued the card. At the same time, customers desiring a particular carrier can always reach their carrier of choice by dialing an access code. The

⁴ Comments of ITI at 7-13, CC Docket No. 92-77 (filed June 2, 1992).

⁵ See Comments of AT&T at 5 n.**, CC Docket No. 92-77 (filed June 2, 1992).

⁶ AT&T Supplemental Filing, Transmittal No. 2902 (Exhibit 1) (May 29, 1991).

Telephone Operator Consumer Services Improvement Act ("TOCSIA")⁷ and the Commission's rules adopted thereunder⁸ assure that the customer knows the identity of the presubscribed carrier, can obtain its rates on request, and can access an alternative carrier if the customer so desires.⁹

As stated by the Pacific Companies in their Initial Comments in this proceeding:

This 0+ interLATA calling card mutuality concept places additional control in the hands of the consumer: if she simply wants her interLATA calling card call to be completed, regardless of the service provider, she will be able to complete her call using 0+ dialing. If a certain carrier is preferred, she will be able to dial an access code to reach that carrier.

* * *

Through 0+ interLATA calling card mutuality, consumers would have the benefit of 0+ calling card dialing all the time unless they choose to access a particular carrier using a proprietary calling card and therefore use access code dialing. It is a valid alternative to BPP because it gives the choice of 0+ dialing to all consumers. Most consumers, it can be argued, simply want to complete a call at a reasonable price. If consumers are particularly price and/or feature sensitive, they can

⁷ 47 U.S.C. 226.

⁸ Policies and Rules Concerning Operator Service Providers, 6 FCC Rcd 2744 (1991); Operator Service and Pay Telephone Compensation, CC Docket No. 91-35, FCC 91-214 (Aug. 9, 1991).

⁹ In response to AT&T and Commission concerns that AT&T CIID card customers expect to be charged AT&T rates, certain OSPs have volunteered to adhere to a rate cap in the validation and billing of AT&T's CIID card calls. See, e.g., Joint Comments of Cleartel Communications, Inc. and Com Systems, Inc. at 12, CC Docket No. 92-77 (filed June 2, 1992). ITI also is willing to charge a reasonable rate set by the Commission for AT&T CIID card calls. In the alternative, ITI is willing to announce on all CIID card calls accepted that it will charge its own rates for the calls and that quotes of those rates are available on request.

choose to utilize access codes.¹⁰

B. 0+ in the Public Domain Would Remedy the Competitive Inequities Created By AT&T's CIID Card Program

In addition to optimizing consumer choice, adoption of a policy of 0+ in the public domain also would best address the competitive inequities created by AT&T's CIID card program. If all IXC's are permitted to validate and bill 0+ calling card calls which they receive at presubscribed locations, AT&T cannot use the unfair advantage which it has gained through its abuse of market power in launching the deceptive CIID card campaign to regain aggregator locations. Moreover, only if validation and billing of these cards is permitted, can carriers be assured of recouping the costs they incur when an AT&T customer uses its card on a 0+ basis.¹¹

In contrast, alternative proposals of the Commission in the Notice and other parties in their comments are infeasible or fail to adequately neutralize AT&T's unfair advantage. For example, the Commission indicates that AT&T has a choice either of granting

¹⁰ Comments of Pacific Bell and Nevada Bell Regarding Proprietary Calling Cards and 0+ Access at 5-6, CC Docket No. 92-77 (filed June 2, 1992). See also Comments of BellSouth Telecommunications, Inc. at 4, CC Docket No. 92-77 (filed June 2, 1992 ("If validation and screening data are universally available to OSPs, end users can enjoy the convenience of 0+ dialing while using the billing mechanism of their choice."))

¹¹ As explained in the initial comments of a number of competitive OSPs, every time an AT&T customer uses his or her CIID card on a 0+ basis and reaches a carrier other than AT&T, that carrier incurs costs for access, operator time, and, frequently, validation which cannot be recouped from the cost-causer. See, e.g., Initial Comments of ITI at 21; Joint Comments of Zero Plus Dialing, Inc., OAN Services, Inc. and Resurgens, Inc. on Emergency Motion of an Interim Order, CC Docket No. 91-115 (filed Feb. 10, 1992).

nondiscriminatory access to validation and billing or requiring all its customers only to use their CIID cards with an access code.¹² As ITI stated in its initial comments, requiring all AT&T customers to dial an access code for all CIID card calls is an artificial and inefficient requirement that would only serve to inconvenience AT&T customers at those locations where AT&T is the presubscribed carrier.¹³ Moreover, as demonstrated in the comments of a number of local exchange carriers ("LECs"), it is currently technically impossible for AT&T to distinguish between a 0+ call and a 10XXX0 call.¹⁴ Therefore, it cannot currently limit its customers to access code dialing unless it blocks 10XXX as well as 0+ and relies exclusively on 800 or 950 access codes.

In addition, other parties have suggested that the Commission prohibit all IXC's from paying commissions on proprietary card calls¹⁵ and that AT&T be required to redress its deceptive marketing practices through a remedial marketing campaign.¹⁶ Although ITI does not object to these suggestions, they do not go far enough to

¹² Notice, para. 42.

¹³ Initial Comments of ITI at 22.

¹⁴ See, e.g. Comments of Southwestern Bell Tel. Co. at 6, CC Docket 92-77 (filed June 2, 1992); Comments of U S West Communications, Inc. Concerning Proprietary Calling Cards at 6-7, CC Docket No. 92-77 (filed June 2, 1992); Comments of the Ameritech Operating Companies Concerning the Use of Proprietary Calling Cards on 0+ Calls at 3, CC Docket No. 92-77 (filed June 2, 1992).

¹⁵ Comments of Sprint Communications Company at 14, CC Docket No. 92-77 (filed June 2, 1992).

¹⁶ E.g. Comments of Zero Plus Dialing, Inc. at 6, CC Docket No. 92-77 (filed June 2, 1992).

eliminate the competitive inequities created by AT&T's CIID card program. Only by declaring all 0+ dialing in the public domain can the Commission return the operator services marketplace to an environment of fair competition in which consumers can freely choose how they wish to place an operator services call.

C. 0+ in the Public Domain is Fully Consistent with the Commission's Proposed Transition to Billed Party Preference

Finally, adoption of a policy of 0+ in the public domain will provide a logical transition to billed party preference, should the Commission ultimately adopt that regulatory scheme.¹⁷ Billed party preference will allow the billed party to access its preferred carrier simply by dialing 0+ the number. Therefore, adoption of an interim system that promotes easy 0+ dialing, rather than converting all proprietary card calls into access code calls, is most consistent with the transition to billed party preference. Moreover, as discussed at length in ITI's initial comments, unless the Commission takes some action to preserve competition in the existing presubscription marketplace, AT&T will remonopolize operator services by the time billed party preference can be implemented. Accordingly, the Commission must require carriers to provide access to billing and validation for all 0+ proprietary CIID cards for the interim period pending possible implementation of billed party preference.

¹⁷ As noted by ITI in its initial comments, there are serious questions concerning the cost-effectiveness of a system of billed party preference and ITI may oppose the Commission's proposal in its comments on those issues.

II. ADOPTION OF A POLICY OF 0+ IN THE PUBLIC DOMAIN IS TECHNICALLY FEASIBLE

As demonstrated in the record, there are no technical impediments to requiring AT&T to provide access to validation and billing of its CIID cards. For example, in the Comments of Zero Plus Dialing, Inc. ("ZPDI"), it was explained that "AT&T's proprietary CIID card validation is already accessible through the Signalling System Seven (SS7) networks that AT&T, all other IXC's, and the LECs use to validate calling cards contained in the LEC's LIDBs."¹⁸ ZPDI further explained that, by removing restrictions designed to limit access by competitors, "IXCs would be able to validate AT&T's CIID cards in precisely the same manner they validate LEC non-proprietary calling cards."¹⁹

Similarly, billing and collection of AT&T CIID cards can be easily accomplished through the translation of CIID card numbers to billing telephone numbers. Whether or not it is then appropriate to supply IXC's with billing name and address ("BNA"), so that they can arrange their own billing of the calls, or with billing and collection services through the LECs or some other third party depends, in part, on the Commission's resolution of BNA related issues currently pending in CC Docket No. 91-115.²⁰

¹⁸ Comments of ZPDI at 10, CC Docket No. 92-77 (filed June 2, 1992).

¹⁹ Id. In fact, ZPDI reports that Airfone already has access to the AT&T CIID card validation database.

²⁰ Policies and Rules Concerning Local Exchange Carrier Validation and Billing Information for Joint Use Cards, CC Docket No. 91-115, (rel. May 8, 1992).

Clearly, however, the privacy of the customer's account information could be maintained by using an independent third party to process the CIID card translation and billing. Moreover, to the extent that customers are concerned about sharing of their account data with IXCs other than the card issuer, they can insure that no other IXC obtains that data by always using an access code with their card.

III. THE PURPOSE OF AT&T'S CIID CARD PROGRAM HAS BEEN TO REMONOPOLIZE THE OPERATOR SERVICES MARKETPLACE, NOT TO PROTECT ITS CUSTOMERS FROM THE RATES OF COMPETITORS

A persistent theme running through AT&T's comments in this proceeding and earlier dockets on the same issue has been that AT&T introduced the proprietary CIID calling card in order to protect its customers from "often-unscrupulous 'AOS' providers" rather than for its own competitive benefit.²¹ AT&T states in these comments that "AT&T's decision to deploy the current CIID-format card is in large part a response to customers' legitimate demands for protections from . . . AOS practices."²² This contention is easily refuted by reference to AT&T's own behavior and marketing literature on the CIID card.

First, if AT&T had really intended to market a card that "protected" its customers, it would have introduced a card that guaranteed its customers access to AT&T. The CIID card, however, like all 0+ calling cards, is a billing card, not a routing card.

²¹ Comments of AT&T at 5 n. **, CC Docket No. 92-77 (filed June 2, 1992).

²² Id.

When used on a 0+ basis, as intended, it merely assures that the caller will reach the carrier presubscribed to the telephone. As the attached Declarations of ITI employees demonstrate, numerous AT&T CIID customers have reached ITI and continue to reach ITI by dialing 0+. The CIID number is nothing more than a billing account which AT&T has decided to share only with the LECs. If AT&T had intended to supply its customers with guaranteed access to the AT&T network, it would have marketed a routing card, such as that used by MCI, that could only be used if the customer first dials an access code which connects the caller to the AT&T network. Therefore, AT&T's choice of calling cards was entirely inconsistent with its purported purpose of protecting its customers.

Second, if AT&T had intended to improve the quality of services available to its calling card customers, it would have heeded its own marketing studies and not adopted a calling card format which its customers found difficult to use. In the Spring of 1990, AT&T tested consumer attitudes toward non-telephone line number cards and encountered "strong resistance" from customers. AT&T found that:

Current AT&T Cardholders expressed strong resistance to the introduction of the new non-Telephone Line based card largely due to the perceived inconvenience of using a calling card which is not based on the home phone number. Few cardholders feel that they will be able to memorize a random series of numbers. Most feel this change will necessitate their constant and inconvenient referral to the card whenever they place a call.²³

²³ AT&T Supplemental Filing, Transmittal No. 2902 (Exhibit 1) (May 29, 1991) (originally submitted with Comments of Capital Network Systems, Inc., CC Docket No. 91-115 (Aug. 15, 1992)).

Nevertheless, AT&T introduced the CIID card.

Third, if AT&T had intended to protect its customers from unscrupulous business practices, it would not have lied to its customers in order to induce them to destroy their old, easy to use, shared use calling cards in favor of the CIID card. The docket in this and other proceedings is replete with examples of AT&T's deceptive and misleading CIID card marketing practices.²⁴ Moreover, it is probative that AT&T appears to have changed the thrust of its campaign from blaming the CIID card on "government regulation" to "AOS companies."

Clearly, the record in this rulemaking demonstrates that

²⁴ E.g., Bell Atlantic's Response to CompTel's Motion Concerning CIID Calling Cards at 1-3, CC Docket No. 91-115 (filed Feb. 10, 1992; Comments of Southwestern Bell Telephone Company in Response to Emergency Motion of Competitive Telecommunications Association at 6-7, CC Docket No. 91-115 (filed Jan. 28, 1992); Reply Comments of the Ameritech Operating Companies at 2-3, CC Docket No. 91-115 (filed March 11, 1992); Reply Comments of the NYNEX Telephone Companies at 1-2, CC Docket No. 91-115 (filed Mar. 11, 1992); Comments of the NYNEX Telephone Companies on AT&T's Direct Case at 6, AT&T Communications, Transmittal Nos. 3380, 3537, 3542, and 3543, (filed Feb. 27, 1992); Comments of Pacific Bell and Nevada Bell in Response to CompTel's Emergency Motion for an Interim Order at 2, CC Docket No. 91-115 (filed Feb. 10, 1992); BellSouth Opposition to Direct Case at 9 n.12, AT&T Communications, Transmittal Nos. 3380, 3537, 3542, and 3543, (filed Feb. 27, 1992). See also Reply Comments of the Saco River Telegraph and Telephone Company in response to Comments on the Emergency Motion Competitive Telecommunications Association, et. al, CC Docket No. 91-115 (filed March 10, 1992).

AT&T's introduction of the CIID card had nothing to do with providing quality service to its customers. Rather, as demonstrated in AT&T's marketing materials aimed at the aggregator marketplace, AT&T's purpose behind the CIID card was to remonopolize operator services. The record in this proceeding and others fully demonstrates that AT&T intended to leverage its market power in the calling card market into the presubscription marketplace in order to regain aggregator locations. By issuing a proprietary CIID card which no other IXC can validate or bill, AT&T has been able to promise aggregators higher overall commissions.

As are most of AT&T's pretextual justifications for issuing the CIID card, AT&T's defense that any carrier could offer a CIID card is typically cavalier and disingenuous. Only a carrier with extreme market power could successfully issue a calling card which its customers find inconvenient to use and which operates on a 0+ basis.

Accordingly, ITI urges the Commission to pierce through AT&T's self-serving claims and recognize, as it already has, in part, the true purpose behind the CIID card program -- to remonopolize operator services at the expense of its customers. Only a decision by the Commission declaring 0+ dialing in the public domain can neutralize AT&T's assault on the operator services marketplace.


IV. CONCLUSION

For the foregoing reasons, ITI respectfully requests the Commission to require carriers issuing proprietary 0+ CIID cards

to provide nondiscriminatory access to validation and billing for their calling cards.

Respectfully submitted,

INTERNATIONAL TELECHARGE, INC.

By 

Greg Casey
Senior Vice President, Regulatory
Affairs
Jane A. Fisher
Director, Federal Regulatory (Acting)

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(301) 571-8665

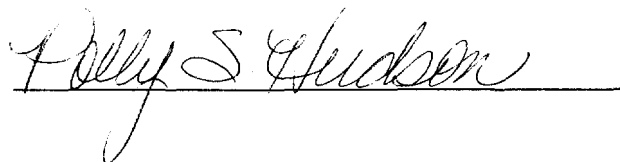
June 17, 1992

DECLARATION

I, Polly Hudson, hereby declare as follows:

1. My name is Polly Hudson and I am Group Manager for International Telecharge, Inc.
2. In my current position, I am responsible for managing six supervisors who manage approximately 210 operators during a specific shift in the toll center. These supervisors support the operators in handling problem calls and those which involve customer difficulty in placing calls. The close rapport that I have with these supervisors keeps me informed and in touch with the difficulty and the complexity involved in just trying to place a customer's call.
3. In the past year the complaints have increased greatly and the majority of concerns focus on the customer's attempt to use cards in the CIID format. However, it is only a very small minority of customers that continually insist on utilizing AT&T. Most, we have experienced, just want to place their call and are baffled, confused, frustrated and in many cases angered by the fact that ITI cannot accept their CIID card. It is a continual challenge for ITI's employees because it is just as frustrating for us to end a call knowing we have not been able to assist the customer in placing their call and, in fact, have left the customer feeling "helpless" in their situation. This is not the win-win philosophy ITI has tried to demonstrate in all phases of its business operations.
4. I declare under penalty of perjury that the foregoing statement is true and correct.

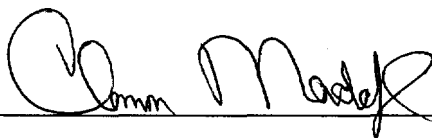
Executed on June 15, 1992

A handwritten signature in cursive script, reading "Polly S. Hudson", is written over a horizontal line.

DECLARATION

I, Clem Maddox, declare as follows:

1. My name is Clem Maddox and I am Director of Toll Center Operations for International Telecharge Inc.
2. In my current position I am responsible for overseeing the day to day activities and operations of the Toll Center. The main focus of our product is the processing of long distance operator assisted calls.
3. In my capacity, I am constantly faced with different challenges, the single most aggravating situations are when customers become frustrated when they are unable to complete their call over our network.
4. Although a small percentage of the CIID customers request AT&T, the majority of the consumers would like to just place a simple call with the least amount of difficulty.
5. I declare under penalty of perjury that the foregoing statement is true and correct.

 6/15/92

Executed on June 15, 1992

DECLARATION

I, Barbara Chenevert, declare as follows:

1. My name is Barbara Chenevert and I am Group Manager of Operator Services for International Telecharge, Inc.

2. In my current position I am responsible for, among other things, working closely with a team of supervisors, each of whom is responsible for a team of 25 to 30 operators.

3. I work closely with the operators on the toll center and I am aware of the various problems that customers are having on the network. The AT&T CIID card has caused much confusion and anger for customers wishing to place a call from a phone on our network. The majority of these customers just want to place their calls without delay and do not request AT&T. The verification problems created by the CIID card make the customers upset that they cannot process their call.

4. We have dealt with this issue for almost a year and the problem seems to be getting worse.

5. I declare under penalty of perjury that the foregoing statement is true and correct.

Barbara Chenevert 6-15-91

Executed on June 15, 1992

101 00 00 00:00

010 FOL

DECLARATION

I, Kevin Ann Marcyes, hereby declare as follows:

1. My name is Kevin Ann Marcyes and I am Director of Support Services for International Telecharge, Inc.
2. In my current position, I am responsible for personnel functions which include recruiting, employee relations and administrative support of the workforce at the toll center.
3. On June 15, 1992 I met with numerous Operators to give them the opportunity to read and sign a Declaration concerning the AT&T CIID card. Every Operator that I met with read the Declaration that is attached and those that wished to sign the signature sheets were given the opportunity to do so. Each Operator that signed the signature sheets did so voluntarily, acknowledging that the difficulties described were indeed their experience.
4. I declare under penalty of perjury that the foregoing statement is true and correct.

Executed on June 16, 1992

Kevin Ann Marcyes

DECLARATION

We declare as follows:

1. We are Operators for International Telecharge, Inc.
2. In our current positions we are responsible for processing long distance calls.
3. Throughout the course of the day we are faced with many different call situations.

However, the most common complaint we receive from customers placing calls over our system is "why is it so difficult to place a simple call". Their complaint is usually about the AT&T CIID calling card. The customers become aggravated and confused about just trying to get a simple call placed.

4. We declare under penalty of perjury that the foregoing statement is true and correct.

Executed on June 15, 1992

PRINT NAME

Lorri D. Wingfield

AHSAH ZAMAN

SANDRA BAKER

Tracey Cooper

Chitthanome Kittirath

SANDY GUSTAFSON

FANNIE JUSTICE

Roslyn R Thomas

Evelyn Madden

Jarr Tarsha Gibson

TERRI LaBruce

TONI HAMILTON

Phil Rose

Lisa Baker

BEV SMITH

Annette Jones

Marcia Trent-Holland

Bridget Brooks

JUAN LOPEZ

Michelle McGee

SIGNATURE

Lorri D. Wingfield

JZ

Sandra Baker

Tracey Cooper

Chitthanome Kittirath

Sandy Gustafson

Fannie Justice

Roslyn R Thomas

Evelyn Madden

Tarsha Nelson

Terri LaBruce

Toni Hamilton

Phil

Lisa Baker

Bev Smith

Annette Jones

Marcia Trent-Holland

Bridget Brooks

Juan Lopez

Michelle McGee

PRINT NAME

Jerry D. Swanson

Angelica Nino

Nikki Walker

Jesse Davila

Paul Daniels

THELMA TREJO

Rosa Serna

Belinda De Hoyos

Alexandra Favela

Robert Muroquin

Lisa Law

ALBERTA BAILEY

NICOLA POOR

Shamarray Mabry

MISTY GRIGGS

Kayon Bayfield

~~DR~~ BRIGGETTE HALL

FRANCES BIGGERS

Jane Oliver

RALPH AGUILAR

SIGNATURE

Jerry D. Swanson

Angelica Nino

Nikki Walker

Jesse Davila

Paul Daniels

Thelma Trejo

Rosa Serna

Belinda De Hoyos

Alexandra Favela

Robert Muroquin

Lisa Law

Alberta Bailey

Nicola Poor

Shamarray Mabry

Misty Griggs

Kayon Bayfield

Brigitte Hall

Frances Biggers

Jane Oliver

Ralph Aguilar